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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Regarding
Revisions to the California Universal
Telephone Service (LifeLine) Program.

Rulemaking 11-03-013

**RULING REQUESTING COMMENTS ON AUGUST 6 – 7, 2018
WORKSHOP AND ON POTENTIAL CALIFORNIA
LIFELINE PILOT PROGRAMS**

Summary

The California LifeLine Program (California LifeLine) hosted a two-day workshop (Workshop) on August 6-7, 2018 in Sacramento, California. This Ruling seeks comment on: 1) additional potential California LifeLine pilot programs and partnerships for the California Public Utilities Commission's consideration; 2) Workshop presentations and proposals; 3) the Workshop Transcript; and 4) two Federal Communications Commission proposals.

1. Background

The California Public Utilities Commission (Commission) designed the California LifeLine Program (California LifeLine or Program) to ensure that basic telephone service remains affordable for low-income Californians. The federal Lifeline (federal Lifeline or Lifeline) program is moving away from supporting traditional telephone service or voice communications and moving toward supporting only broadband internet access service (broadband service). In light of these federal changes, the Commission seeks input of stakeholders to

determine what path the California LifeLine Program should take to best meet the communications needs of the low-income households in California.

On December 1, 2017, the Federal Communications Commission (FCC) issued *Fourth Report and Order, Order on Reconsideration, Memorandum Opinion and Order, Notice of Proposed Rulemaking, and Notice of Inquiry (NPRM/NOI)*¹. In the *NPRM/NOI*, the FCC proposes a number of changes to the federal Lifeline program to accomplish two objectives: 1) to curtail waste, fraud, and abuse; and 2) to target low-income areas plagued by the lack of broadband service. The Commission needs to consider the impact the *NPRM/NOI* may have on California LifeLine and whether changes to California LifeLine are warranted as a result of the proposed changes put forward in the *NPRM/NOI*. The Commission is concerned with the apparent FCC policy shift from the current range of service providers (facilities-based service providers and resellers) to focusing or limiting the federal Lifeline program to distinct types of service providers, geographic regions (rural versus urban areas), and types of low-income households. In light of the FCC's changing focus, the Commission seeks to thoughtfully determine what the future of the California LifeLine Program should be to effectively serve California LifeLine participants.

California LifeLine hosted a two-day workshop (Workshop) on August 6-7, 2018 in Sacramento, California.² i-Foster, The Greenlining Institute,

¹ See, In the Matter of Lifeline and Link Up Reform and Modernization et al., WC Dkt Nos. 11-42, 09-197, 17-287 *Fourth Report and Order, Order on Reconsideration, Memorandum Opinion and Order, Notice of Proposed Rulemaking, and Notice of Inquiry (NPRM/NOI)*, FCC 17-155 (rel. December 1, 2017).

² See workshop agenda at http://cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/Utilities_and_Industries/Communications_-

San Francisco County Office of Digital Equity, California Labor and Workforce Development Agency, Boost Mobile, and California Emerging Technology Fund made presentations at the Workshop.¹ The Workshop discussed the use of pilot programs as a means to explore potential redesign of California LifeLine. The Workshop also explored establishing partnerships with government (state and

[Telecommunications and Broadband/Consumer Programs/California LifeLine Program/Workshop Agenda 072718.pdf.](#)

¹ See workshop presentations at

[http://cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/Utilities and Industries/Communications_-](http://cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/Utilities_and_Industries/Communications_-)

[Telecommunications and Broadband/Consumer Programs/California LifeLine Program/CA%20LL%20August%20Workshop%20Presentation%20Day%201.pdf,](http://cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/Utilities_and_Industries/Telecommunications_and_Broadband/Consumer_Programs/California_LifeLine_Program/CA%20LL%20August%20Workshop%20Presentation%20Day%201.pdf)

[http://cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/Utilities and Industries/Communications_-](http://cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/Utilities_and_Industries/Communications_-)

[Telecommunications and Broadband/Consumer Programs/California LifeLine Program/CA%20LL%20August%20Workshop%20Presentation%20Day%202.pdf,](http://cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/Utilities_and_Industries/Telecommunications_and_Broadband/Consumer_Programs/California_LifeLine_Program/CA%20LL%20August%20Workshop%20Presentation%20Day%202.pdf)

[http://cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/Utilities and Industries/Communications_-](http://cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/Utilities_and_Industries/Communications_-)

[Telecommunications and Broadband/Consumer Programs/California LifeLine Program/ifoster.pdf,](http://cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/Utilities_and_Industries/Telecommunications_and_Broadband/Consumer_Programs/California_LifeLine_Program/ifoster.pdf)

[http://cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/Utilities and Industries/Communications_-](http://cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/Utilities_and_Industries/Communications_-)

[Telecommunications and Broadband/Consumer Programs/California LifeLine Program/LL%20Pilot%20Project%20Greenlining.pdf,](http://cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/Utilities_and_Industries/Telecommunications_and_Broadband/Consumer_Programs/California_LifeLine_Program/LL%20Pilot%20Project%20Greenlining.pdf)

[http://cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/Utilities and Industries/Communications_-](http://cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/Utilities_and_Industries/Communications_-)

[Telecommunications and Broadband/Consumer Programs/California LifeLine Program/SF%20Office%20of%20Digital%20Equity.pdf,](http://cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/Utilities_and_Industries/Telecommunications_and_Broadband/Consumer_Programs/California_LifeLine_Program/SF%20Office%20of%20Digital%20Equity.pdf)

[http://cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/Utilities and Industries/Communications_-](http://cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/Utilities_and_Industries/Communications_-)

[Telecommunications and Broadband/Consumer Programs/California LifeLine Program/Digital%20Learning%20and%20Workforce.pdf,](http://cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/Utilities_and_Industries/Telecommunications_and_Broadband/Consumer_Programs/California_LifeLine_Program/Digital%20Learning%20and%20Workforce.pdf)

[http://cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/Utilities and Industries/Communications_-](http://cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/Utilities_and_Industries/Communications_-)

[Telecommunications and Broadband/Consumer Programs/California LifeLine Program/Boost%20Mobile.pdf,](http://cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/Utilities_and_Industries/Telecommunications_and_Broadband/Consumer_Programs/California_LifeLine_Program/Boost%20Mobile.pdf) and

[http://cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/Utilities and Industries/Communications_-](http://cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/Utilities_and_Industries/Communications_-)

[Telecommunications and Broadband/Consumer Programs/California LifeLine Program/CETF.pdf.](http://cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/Utilities_and_Industries/Telecommunications_and_Broadband/Consumer_Programs/California_LifeLine_Program/CETF.pdf)

local) agencies, non-profit organizations (*e.g.*, i-Foster), and facilities-based communications service providers (*e.g.*, Boost Mobile) to create and implement potential pilot programs. Moreover, the Workshop gathered stakeholder input regarding how California LifeLine can continue to meet the minimum communication needs of California's low-income households' despite current and anticipated changes at the federal level.

2. Comments Requested about California LifeLine Pilots and Partnerships

Parties may file comments on any or all of the following:

- 1) Other potential California LifeLine pilot programs and partnerships;
- 2) Workshop presentations;
- 3) Boost Mobile and i-Foster proposals;
- 4) Comments memorialized in the Workshop Transcript (Attachment A); and
- 5) Two specific FCC proposals/suggestions:
 - Requiring proof of eligibility during the renewal process; and
 - Requiring consumers living in multi-unit housing to provide proof of residence in this type of housing.

Parties seeking to provide comments in response to this ruling must do so by September 10, 2018. Stakeholders who participated in the Workshop and are not yet parties to this proceeding shall move for party status. The Commission intends to issue a proposed decision addressing pilots and partnerships between September and October 2018.

3. Schedule of Events

This Ruling also provides the schedule for upcoming public meetings, the deadline for comments, and additional activities.

EVENT	DATE
Deadline for Comments for this Ruling	September 10, 2018
Workshop (Pilots and Partnerships) California Energy Commission, Imbrecht Hearing Room 1516 9th Street Sacramento, CA 95814	September 14, 2018 10:00 a.m.-4:00 p.m.
Workshop (Pilots and Partnerships) Juniper Serra State Building, Carmel Conference Room, 1 st Floor 320 West 4 th Street, Los Angeles, CA 90013	October 19, 2018
Workshop (Renewals) California Public Utilities Commission Golden Gate Room 505 Van Ness Avenue San Francisco, CA 94102	November 6, 2018 10:00 a.m.-4:00 p.m.
Launch Approved Pilots and Partnerships	4 th Quarter 2018

We will host additional public meetings/workshops at a later time. Details about public meetings will be available at <http://cpuc.ca.gov/General.aspx?id=3045>

IT IS RULED that comments to this Ruling shall be filed by September 10, 2018.

Dated August 31, 2018 at San Francisco, California.

/s/ KATHERINE KWAN
MACDONALD

Katherine Kwan MacDonald
Administrative Law Judge

Attachment A

BEFORE THE PUBLIC UTILITIES COMMISSION OF
THE
STATE OF CALIFORNIA

FACILITATOR: COMMUNICATIONS DIVISION -
CALIFORNIA LIFELINE TEAM

)	WORKSHOP
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Order Instituting Rulemaking)	
Regarding Revisions to the)	Rulemaking
California Universal Telephone)	11-03-013
Service (LifeLine) Program.)	
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REPORTER'S TRANSCRIPT
Sacramento, California
August 7, 2018
Pages 75 - 105
WS - 3

Reported by: Shannon Ross, CSR No. 8916

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SAN FRANCISCO, CALIFORNIA

AUGUST 7, 2018

* * * * *

(The following transcribed
from digital audio file.)

ADMINISTRATIVE LAW JUDGE MacDONALD:

Will be included in the ruling, so
they will be attached to the ruling. So
those entities do not need to make extensive
comments trying to put all of that
information into an oral statement.

I think, actually, the presentations
will be a more effective tool for people to
comment on; so I wanted to make sure that was
clear, and then CD staff will organize and
call you up to do the comments.

Because these comments are going to
be transcribed by a court reporter who does
not have the benefit of being here, there are
a couple of requests: One, state your name;
please spell it. State the entity that you
are representing. If there's any question
about the spelling, spell that as well. It
would be great if you could speak slowly
clearly and mindfully that someone is going
to record these. They are very skilled, but
some people talk extremely quickly. So those
are the only requests with the transcript.

1 The transcript will be attached to
2 the ruling. If it is not accurate, you'll be
3 able to comment on that. If there are things
4 that you didn't get to say, you'll also be
5 able to add that in your comments.

6
7 STATEMENT OF MS. HERNANDEZ

8
9 MS. HERNANDEZ: Good afternoon.
10 Jennifer Hernandez, J-e-n-n-i-f-e-r,
11 H-e-r-n-a-n-d-e-z, with the Labor and Work
12 Force Development Agency. Sorry I wasn't
13 able to join you today.

14 I just wanted to come back and share
15 a few highlights of what we think is a good
16 opportunity to work with you all as you're
17 deliberating on these issues.

18 So I just wanted to reemphasize,
19 more importantly, that we see a lot of
20 opportunity to work with you on some specific
21 target populations that we're already working
22 with in the Work Force programs; right.

23 So yesterday I discussed working
24 around the immigrant population, English
25 language learners. We've invested quite a
26 bit to really rethink how we deliver services
27 to this population. It requires a lot of
28 innovation in changing the existing paradigm,

1 and I think that using digital technology is
2 one way we can start to begin to really serve
3 that population. So that would be first.

4 Even within that, within the English
5 learner community, I think farm workers in
6 rural communities are another huge
7 opportunity. The programs that we've seen
8 implemented have been very successful at
9 targeting this population, and I think that
10 given the geographical challenges that we're
11 seeing, it becomes even more important to
12 leverage this digital technology.

13 Believe it or not, there are still
14 counties within California that don't have
15 Adult Education programs and folks have to
16 travel; right? So that's problematic.

17 The other -- I would point out the
18 other two are the returning-citizen
19 population. This administration has
20 definitely prioritized really rethinking how
21 we deliver services to create more
22 opportunities for returning citizens.

23 And we're in the process of
24 launching a new initiative, the Prison to
25 Employment Pipeline that really is trying to
26 fill the gaps to be able to provide training
27 and education opportunities to returning
28 citizens.

1 UNIDENTIFIED SPEAKER: (Inaudible.)

2 MS. HERNANDEZ: Yes. The reentry.
3 Sorry. There's a lot of jargon there.

4 And then the last is partnering with
5 our programs in Social Services. So whether
6 it's Cal Fresh, CalWorks or many programs -
7 they are low income communities - they are
8 already being served within the Work Force
9 system, and I think there's some creative
10 opportunities to be able to leverage some
11 additional funding to really create a good
12 opportunity.

13 I think the one area that I would
14 like to explore, continuing to work with you
15 all, is how we leverage each others'
16 resources; how we can collaborate and share
17 information out to the folks that you're
18 already serving on our programs and vice
19 versa so that we can enhance that partnership
20 and create -- bring in more people into the
21 Work Force programs and into your programs;
22 right.

23 So that's low hanging fruit, but the
24 other is that for many of our programs, there
25 are certain income requirements; right. So
26 perhaps we could explore across these
27 different programs how we could verify
28 eligibility. I think that we're having

1 larger conversations around that in Work
2 Force, and I think there's an opportunity to
3 really chime in given that conversation
4 that's happening.

5 So I look forward to any other
6 support we can provide and ideas and any
7 follow-up questions as you move forward in
8 deliberating.

9 Thank you.

10 ALJ MacDONALD: Thank you.

11
12 STATEMENT OF MRS. YOUNG

13 MRS. YOUNG: Mrs. Vanessa Young,
14 representing the Office of Ratepayer
15 Advocates. Name is Vanessa, V-a-n-e-s-s-a,
16 last name, Young, Y-o-u-n-g.

17 And ORA just has a few points that
18 we wanted to make. The first is, we'd like
19 to encourage access to retail service plans
20 for Lifeline eligible customers.

21 The second is the more retail
22 service providers are brought to the pilot
23 programs the better.

24 Third, the more Social Service
25 providers are brought to the pilot program,
26 also the better.

27 The fourth is, the service offered
28 in the Communications market is way ahead of

1 what is currently defined as a basic service
2 of Lifeline. And so providing meaningful
3 essential service has more data and higher
4 speed than currently what is offered by
5 Lifeline.

6 Number five, the Collective
7 Surcharge Fund should be used and future
8 surcharges should be judiciously computed.

9 Number six, voice is an essential
10 service and Lifeline should continue to
11 support it.

12 Number seven, recognize that
13 broadband should be a basic service, but
14 taking into consideration budget and funding
15 constraints.

16 And our last comment, for right now,
17 is that we do seek transparency in the costs
18 incurred related to Lifeline.

19 ALJ MacDONALD: We can be off the
20 record at this point.

21 (Off the record.)

22 STATEMENT OF MS. MAILLOUX

23 MS. MAILLOUX: A couple of things that
24 I want to point out.

25 First of all, I will skip the
26 platitudes except to say -- I even have
27 "name" right here. That's Christine
28 Mailloux, M-a-i-l-l-o-u-x. And I am with

1 TURN, The Utility Reform Network. So I do
2 appreciate this process and look forward, as
3 I understand it, to participating in future
4 processes. I think there is no substitute to
5 sitting around a table and sharing stories
6 and talking about issues face-to-face. So
7 thank you for that.

8 I also want to say that for the
9 bigger picture of what's next in this
10 proceeding, I think TURN does share the
11 common goals of what a lot of people have
12 talked about today, including the
13 Commissioner, which is to increase
14 participation and, just as importantly,
15 increase the customer experience with the
16 program -- which does also include
17 encouraging carriers to continue to
18 participate in the program. We see that as
19 integral parts to it, but yet there's no
20 point in increasing -- encouraging carriers
21 to participate without resulting in increased
22 customer experience. So that's our main goal
23 at TURN.

24 I also want to reiterate TURN's role
25 in this proceeding. I believe it's to
26 balance the interests in having a robust,
27 independent, very functional, and meaningful
28 program while, at the same time, being

1 mindful of ratepayer interests and paying the
2 surcharges that go to subsidies that support
3 this program. And I will continue to do my
4 best to balance that piece of the discussion.

5 On the pilot programs, particularly,
6 I think that it's a great idea to do pilot
7 programs. And, again, appreciate the
8 opportunity to do some blue-sky thinking
9 about these pilot programs. I think my
10 principle with my these pilot programs --
11 there are a couple principles I have with
12 these pilot programs: I want to make sure
13 that they are value-add to the program.

14 I said this yesterday, I think it's
15 true, I want to see an increase in benefits,
16 an increase in customer experience. I hope
17 not to see less benefits for more money. And
18 I'm going to be kind of bird-dogging that for
19 the long-term depending on how the pilot is
20 structured.

21 I also want to make sure that these
22 pilots are treated as pilots. And we talked
23 about, for the one that was floated, 18 to 24
24 months. That might be a good time frame. I
25 think there are pilots that could go on too
26 long, and then there are pilots that -- but
27 we do need to make sure that the pilots go on
28 long enough to gather sufficient data and

1 make sure that customers have a real
2 experience with the pilot.

3 This Commission needs to follow
4 through though. We've raised pilots before
5 that kind of went nowhere, or that then sat
6 and became the norm. And so for a pilot, if
7 we're uncomfortable with some of the terms of
8 the pilot, I want to make sure that that
9 pilot doesn't become the norm and become
10 expected going forward. So that is something
11 I will guard against.

12 I definitely want to encourage
13 opportunities for stakeholders to comment on
14 the pilots before they are too far down the
15 road, and to be given sufficient input and
16 data and information about a potential pilot
17 so we can meaningfully comment on that pilot.

18 I will reserve my comments,
19 specifically the iFoster Boost Pilot, for
20 what I hope will be a little bit more
21 information and fleshing out of that pilot so
22 we can present comments or, at a minimum, I
23 can put my comments for what I know right now
24 in writing.

25 Now, moving on away from pilots, I
26 think this program is extremely important. I
27 really want to encourage this program to
28 continue to be an independent program, a

1 strong and robust independent program. And I
2 will resist calls just to mirror what the FCC
3 is doing. And I think our discussion this
4 afternoon demonstrated, we don't want to
5 mirror what the FCC is doing. We want to
6 maintain and continue to be a strong and
7 independent program.

8 I want to urge continued funding for
9 voice here. If we have to do it at
10 state-only level, then we shall. We should
11 be doing that. I also want to encourage and
12 echo ORA's comments about the possibility of
13 including broadband in this program, but that
14 will take a little bit more discussion about
15 how to do that.

16 I want the Commission to consider
17 the ability for two discounts: Maybe one at
18 federal, one at state, but allowing a
19 customer to be able to have discounted
20 service for both broadband and voice in some
21 combination. I think that will be important
22 for TURN. Minimum service standards will
23 also be very important for TURN on both state
24 and broad -- on both voice and broadband
25 services. And that goes to getting
26 appropriate value for the subsidy money that
27 we would be giving to these carriers, and the
28 only way to do that is through minimum

1 service standards.

2 And, finally, I guess to have that
3 conversation about what the future looks like
4 and how to coordinate what the FCC is doing
5 while maintaining an independent program will
6 require some cost data. I will be happy to
7 provide additional thoughts on that. I think
8 there's a balance between understanding what
9 we feel like we need to move forward without
10 getting too bogged down in what could be a
11 very detailed and difficult process. But we
12 will continue, as we have in the past, by
13 requesting cost data to justify the paying of
14 subsidy and ratepayer-funded subsidy money.

15 Thank you very much.

16
17 STATEMENT OF MR. HUANG
18

19 MR. HUANG: Good afternoon, everyone.
20 David Huang on behalf of small LEC's. That's
21 D-a-v-i-d, H-u-a-n-g.

22 So I'll keep it short here. Small
23 LEC's would like to reserve our substantive
24 comments for the written section. But, just
25 on a very high level, I'm fairly new to this
26 proceeding and I really do appreciate the
27 Commission for putting together this two-day
28 workshop. It was very informative.

1 And, just at a very high level, I'll
2 say when considering how the state will
3 respond to possible changes at the federal
4 level, we would like the Commission to take
5 into consideration that the small LEC's
6 space, the constraints of tariffed carriers,
7 percentage-wise, it would be crushing to not
8 be able to sufficiently recover the costs
9 related to Lifeline. Because unlike URF
10 carriers, the small LEC's cannot make up the
11 cost in other parts of our business.

12 Thank you.

13
14 STATEMENT OF MR. VANARSDALL

15
16 MR. VANARSDALL: Jason Vanarsdall, with
17 StandUp Wireless. J-a-s-o-n,
18 V-a-n-a-r-s-d-a-l-l. I would like to state,
19 for the record, Maheen Cook from the National
20 Lifeline Association has a few things to say
21 that we support. But as individually TC, our
22 ability to comment at this time is limited.
23 We plan to go into more detail in our written
24 comments, but I will say the pilot program in
25 general is an exciting idea.

26 I hope the Commission will let us
27 know what their definition of success looks
28 like and provide us with guidelines and

1 answer the following five questions:

2 One, specifically, what metrics will
3 you use to determine success?

4 In order to prevent you from dealing
5 with off-the-wall ideas, general cost
6 guidelines will be extremely helpful in our
7 brainstorming session.

8 Two, what community-based
9 organization, or CBOs, can we work with? Or
10 what requirements do you have of a CBO that
11 we can use to determine if a CBO's
12 eligibility determination will be acceptable
13 or not?

14 Three, are you okay with a sliding
15 reimbursement mechanism that adjusts
16 depending on the service plan offered?

17 Four, is there an appetite to move
18 the nonrecurring fee to allow us to provide
19 for a higher quality device?

20 Five, what information are you
21 looking at that is preventing you from moving
22 forward with online enrollment?

23 I genuinely look forward to speaking
24 with Commissioner and staff regarding some
25 ideas to launch these programs.

26 Thank you.

27 STATEMENT OF MS. COOK

28 MS. COOK: My name is Maheen Cook,

1 and I am the General Counsel of the National
2 Lifeline Association or NLA. My name is
3 spelled M-a-h-e-e-n, C-o-o-k.

4 NLA's ETC membership serves 65
5 percent of the California Lifeline wireless
6 subscriber base. We are invested in the
7 communities we serve and openly encourage
8 innovation in the California Lifeline
9 Program. We want to be part of the process
10 in designing a pilot and will present a
11 thorough proposal on the record.

12 We share the CPUC's goals of
13 reaching into unserved and underserved
14 markets. Our members have been seeking to
15 accomplish the same goal as well within the
16 framework of GO-153 and the rules of the
17 Federal Lifeline Program.

18 NLA members are committed to the
19 California Lifeline Program and have
20 participated for many years. We understand
21 that you're looking at unique ways to target
22 a different segment of eligible Lifeline
23 consumers, particularly through pilot
24 programs. We want to work with you to
25 redesign the California Lifeline program, and
26 some concerns and options include the
27 following:

28 First, it will be imperative to

1 define the objectives and success and how to
2 define success, defining data and metrics for
3 analysis, defining timing, budget, and the
4 approval process for a pilot program should
5 all be in place prior to implementation.

6 The budgetary impacts of a pilot
7 should be openly evaluated and reviewed. The
8 CPUC may also want to explore the option of
9 having an economist study the effects of the
10 pilot. The pilot should also be carrier
11 neutral to maximize participation.

12 If CBOs may be facilitating
13 enrollments for Lifeline applicants. The
14 CPUC should establish guidelines around
15 qualifying such CBOs. And to follow up on
16 that, CBOs that may take on the
17 responsibility of enrolling their eligible
18 constitutes, the CPUC should look at
19 requiring training and may want to consider
20 NLA's Agent Certification Program as a
21 parting point.

22 Along those lines, we can provide a
23 more thorough demonstration and explanation
24 of the NLA Certification Program and how that
25 may be used to encourage and facilitate
26 training and certification of CBOs.

27 Finally, in redesigning the program
28 and broadening its reach, we cannot forget

1 the subscribers currently receiving service
2 under the program. They will be well-served
3 by the following revisions to the program:

4 First, that includes full online
5 enrollment, including near or real-time
6 enrollment. We've had this discussion a
7 little bit throughout the workshop. And I
8 will follow up in more detail in the written
9 comments' section.

10 Second, revisions to the annual
11 renewal process. We didn't get to that issue
12 during this workshop, though it was on the
13 agenda. And, again, we'll provide more
14 thorough comments in the written portion on
15 the record.

16 Third -- and I understand that there
17 is a separate proceeding on this -- but
18 reinstatement of the 60-day port freeze. It
19 is important to have that incorporated into
20 the California Lifeline Program. And we will
21 lay out that in our written comments.

22 And, finally, the continuity and
23 consistent logic related to the payment of a
24 nonrecurring reimbursement charge. We will
25 further flesh out the importance of these
26 priorities in our written comments.

27 Thank you for this opportunity. And
28 we look forward to working with you to

1 increase participation in the Lifeline
2 program.

3 STATEMENT OF MS. KASNITZ

4
5 MS. KASNITZ: Melissa Kasnitz,
6 K-a-s-n-i-t-z, with the Center for Accessible
7 Technology. C for AT represents the
8 interests of disabled customers and other
9 vulnerable customers who both tend to be
10 lower income and hard to reach. So they are
11 people who are very dependent on the Lifeline
12 program.

13 I expect to submit written comments,
14 but, for now, to touch on several points:

15 With regard to pilots, I support the
16 goal of the Commission on seeking ways to
17 target populations that have not been
18 adequately served with the current program in
19 terms of being aware of it and being capable
20 of enrolling.

21 I also support efforts to stabilize
22 the participation of populations that are on
23 again and off again for the program, and it
24 would be very interesting to see if it's
25 possible to calculate how many people fall
26 into that group, people who clearly are aware
27 of the program and make use of it, at least
28 part of the time, but, perhaps, don't

1 successfully reenroll or recertify.

2 C for AT does have concerns about
3 potential pilot programs that might not
4 include minimum standards for service or
5 adequate customer protections. So we would
6 be very interested in seeing proposals and
7 having input to make sure that those concerns
8 are addressed.

9 We also have concerns about programs
10 that effectively constitute a voucher program
11 that may not clearly consider whether service
12 with a discount is affordable for customers
13 that need assistance from the Lifeline
14 program.

15 Finally, with regard to pilots, I
16 agree with some other commenters who have
17 noted that the premise of a pilot is that you
18 have a hypothesis that something might
19 improve a program or provide service to a
20 currently underserved community. The pilot
21 should be testing that hypothesis, collecting
22 data to see whether that hypothesis is proven
23 and conducting analysis after the fact. Any
24 proposal that doesn't include those elements
25 isn't really a pilot program and shouldn't be
26 considered as such.

27 Moving to the issue of harmonizing
28 the state program or integrating the state

1 program with the federal program, I stated
2 earlier that the intentions of changes to the
3 federal program are not ones that California
4 should emulate. So, certainly, the state
5 needs to consider activity that's happening
6 on the federal level, but we should not be
7 taking it as a road map to follow. Rather,
8 we should be looking at it as a backdrop
9 against which we need to consider how to
10 effectively serve our California population
11 in need.

12 C for AT supports ongoing support of
13 voice service. We recognize the importance
14 of broadband service, which is of great value
15 to the constituency that we represent, but we
16 also recognize that there are conflicts in
17 how to support expanded broadband access
18 without creating an overly burdensome set of
19 expectations on existing voice customers.
20 And I look forward to figuring out how to
21 best address that concern.

22 And, finally, on issue of costs, I
23 brought that up repeatedly, so I guess I have
24 to address it. It's very important, I think,
25 that we get greater insight than currently
26 exists on carrier costs. At the same time,
27 it's important that we don't get so
28 sidetracked on that issue that the question

1 of what to do with the program gets delayed.

2 I should say, for myself, as a small
3 intervenor, I don't have a lot of resources
4 to conduct detailed analysis of costs. I,
5 hopefully, will be able to look to others to
6 do that, but I do have concerns every time
7 carriers say that one penny less of subsidy
8 will automatically necessitate reduced levels
9 of service. And I think that every time
10 concessions are put on the table, we need to
11 remember that the carriers are a party that
12 might consider concessions as well. So how
13 to balance that portion of the equation needs
14 to be on the table.

15 I'll leave it at that, and look
16 forward to submitting written comments with
17 greater detail.

18 Thank you.

19
20 STATEMENT OF MR. AVILA

21
22 MR. AVILA: Good afternoon. This is
23 David, D-a-v-i-d, Avila, A-v-i-l-a,
24 representing Tracfone Wireless, leading the
25 SafeLink Wireless brand.

26 We appreciate the opportunity to
27 come together and explore ideas presented to
28 those involved in the industry to expand and

1 create contingency plans to help evolve the
2 California Lifeline plan into the future.

3 I see the rollout of this in two
4 categories: One is -- and we spent time
5 discussing this in the redesign of the
6 California Lifeline program, and the use of
7 pilot programs to test new technologies'
8 functionality is certainly the way to go.

9 In order to create success, we need
10 to define exactly what are the metrics that
11 we're going measure post the pilot, and we
12 need to make sure that we're working towards
13 that.

14 Prior to submitting pilot programs,
15 there should be a quick process to determine
16 the viability of what program, whether there
17 is interest in pursuing it so interested
18 parties don't waste their time in creating a
19 concept that may not be able to be developed.

20 So being able to quickly decide
21 that, yes, this is something that should move
22 forward will give the business owner the
23 opportunity to socialize it with the other
24 cross-functional members of the Lifeline
25 industry.

26 It's important that when selecting,
27 and the Communication Division should be very
28 clear whether these pilot programs should be

1 leveraging the use of databases. That is
2 currently one of the gaps that exist today in
3 California. The eligibility determination --
4 or better said, the eligibility confirmation
5 of an individual and doing it in a systematic
6 method. So pilot programs should be
7 leveraging these database to help improve the
8 enrollment process.

9 As a general note, it should be
10 important to the Communications Division to
11 work with providers such as Medi-Cal and SNAP
12 to help streamline the enrollment process.
13 This is very similar to what is being
14 proposed with the national verifier; however,
15 it's important to have the interfaces to work
16 together between the providers and the entity
17 that is establishing eligibility.

18 There was discussions about how to
19 evolve the program into including data. One
20 idea on the table for consideration is the
21 units proposal, which enables the consumer to
22 make the decision how to use their Lifeline
23 subsidy. The units proposal would give a
24 participant of the program a number of units
25 that they could use for voice minutes,
26 texting and megabytes of data. This enables
27 the flexibility for various segments to focus
28 on what's most important to that segment.

1 The second category of improving the
2 California Lifeline program should be looking
3 at where -- examining the existing process
4 that exists today and seeing where quick
5 fixes could improve the overall efficiency
6 and make the program more efficient.

7 For example, the Digital Application
8 Process, the DAP process was one that was
9 created creating PDFs as a way of allowing
10 carriers to submit those to the
11 administrator. That creates a lot of
12 challenges, and replacement of allowing a
13 database where applications could be
14 submitted directly to the administrator would
15 create a lot of efficiencies.

16 At the same time with APIs,
17 real-time information could be provided to
18 agents that are enrolling whether this
19 subscriber is eligible to be enrolled in the
20 program or if they're currently with another
21 subscriber.

22 Other enhancements would be as,
23 you're verifying, whether to use the similar
24 capabilities that is used today with the
25 national database, where you make a call into
26 a database to verify whether this consumer is
27 eligible to migrate to your service or if
28 they're in the system and then a second one

1 for enrollment. This gives flexibility to
2 the entities to make sure that they're doing
3 it right, the steps, and it prevents some of
4 challenges that occurred with consumers being
5 enrolled in the program incorrectly.

6 And, finally, the other enhancements
7 to the existing program is the renewal
8 process, where if the anniversary date to a
9 consumer is reset at the time of the start of
10 the relationship with the new ETC it would
11 solve a lot of the challenges that exist
12 today, where you have many consumers
13 migrating during their recertification
14 period. The ETC is not even aware that that
15 consumer may no longer be eligible for that
16 program and within two days the new ETC
17 receives a notification that the subscriber
18 is no longer eligible for the program.

19 Resetting the anniversary date will
20 help to clear up those confusions.

21 Further, in more detail, filings
22 will be filed with our written comments.

23 Thank you.

24
25 STATEMENT OF MS. JACOBSON

26
27 MS. JACOBSON: Hello, my name is
28 Kristen, K-r-i-s-t-i-n, Jacobson,

1 J-a-c-o-b-s-o-n. And I am providing comments
2 into record on behalf of Boost Mobile. The
3 comments that I'm going to make today are
4 just a little bit of additional detail to the
5 written Pilot Plan Flow proposal that was
6 presented yesterday.

7 I wanted to preface the comments
8 with the pilot with two notes: One, is the
9 pilot plan proposal, which is a partnership
10 proposal with certain state agencies and the
11 CPUC is designed to be parallel program that
12 works in conjunction with existing ETC
13 Lifeline programs in place.

14 Secondly, I wanted to note that the
15 Boost Mobile and Assurance Wireless will
16 likely be providing additional comments in
17 written form to the series of additional
18 questions that were discussed in the workshop
19 setting today.

20 The overarching comments on the
21 pilot program have to do with a primary goal
22 and intention of better infiltration to the
23 Lifeline eligible population in the state of
24 California. This is designed to be an
25 outreach effort to test different theories as
26 to why we believe that the eligible Lifeline
27 population in California, that a great
28 percentage of the eligible Lifeline

1 population in California, is not currently
2 participating in the ETC California Lifeline
3 program.

4 This pilot program is designed to
5 target specific groups. Some of whom are
6 either unable to participate in the current
7 Lifeline program or effectively are unable to
8 participate in the current Lifeline program.

9 And an example of one of those
10 groups who has been present at this workshop
11 and has provided information into the record
12 is iFoster.

13 Boost Mobile is proposing a tiered
14 phaseout to include different sections of the
15 iFoster population into the program, and
16 moving from a first phase, which be different
17 age groups with iFoster on to include other
18 partners such as Cal Fresh, Medi-Cal and
19 potentially others.

20 The selection of these groups is
21 really, again, addressed to an identifying
22 current problems or access issues that exist
23 in the current program and testing out
24 theories to improve the access to the
25 program, frustration with existing the ETC
26 programs regarding application and then the
27 recertification process, and other challenges
28 that the current program includes through the

1 pink envelope process that has to do with
2 frustrations exhibited by populations who are
3 either transient in nature or unable to
4 effectively communicate when there's issues
5 through the application and recertification
6 process.

7 The pilot program also addresses
8 other obstacles and challenges, customer
9 frustrations, concerns over stigma, and
10 efforts at streamlining and improving global
11 presence.

12 The proposed program duration as
13 exhibited in the slides is 18 to 24 months.
14 Boost Mobile believes that that's a
15 sufficient period time to be able to process
16 through each of three phases that it
17 identified. I haven't have had time to
18 educate the partners to work through issues
19 that may arise between people participating
20 in the program, the partners and the CPUC.

21 Another goal is to obtain
22 information during this pilot program that
23 will be measurable for use by the CPUC so
24 that it can go back and look at the existing
25 TC rules and decide whether or not
26 appropriate changes should be made and/or the
27 idea of a parallel program should move
28 forward on an ongoing basis.

1 Boost Mobile also identified during
2 its presentation that it's going to take
3 certain aspects of its offers -- it's going
4 to make special considerations for foster
5 youth in California through iFoster program,
6 so that the program for foster youth may be a
7 little bit different than the other partners
8 and those specifics are still under
9 development with in coordination with iFoster
10 and CPUC. That's all. Thank you.

11

12 (This concludes the transcription
13 of the requested portion of the
digital audio file.)

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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

CERTIFICATION OF TRANSCRIPT OF PROCEEDING

I, Shannon Ross, Certified Shorthand Reporter No. 8916, in and for the State of California, do hereby certify that the pages of this transcript prepared by me comprise a full, true, and correct transcript of the requested portion of the digital audio file in this matter on August 7, 2018.

I further certify that I have no interest in the events of the matter or the outcome of the proceeding.

EXECUTED this 15th day of August, 2018.



SHANNON ROSS
CSR No. 8916

(END OF ATTACHMENT A)